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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., <i>et al.</i> ,)	Case No. 08-356-53 (KRH)
)	
Debtors.)	(Jointly Administered)

**LUMISOURCE, INC.'S OBJECTION TO ORDER ESTABLISHING PROCEDURES
FOR RECLAMATION DEMANDS AND JOINDER IN OBJECTION OF OTHER
RECLAIMING VENDORS**

LumiSource, Inc. (the "Movant"), by and through its attorneys, Williams Mullen and Querrey & Harrow, objects to the November 13, 2008 order establishing procedures for reclamation demands (Docket No. 133) and in support thereof, Movant states as follows:

1. LumiSource, an Illinois corporation, is a vendor that sold approximately \$235,200 worth of goods to the Circuit City Stores, Inc. (the "Debtor") within 45 days prior to the commencement of this case.

2. 11 U.S.C. § 546(c)(1)(A) and (B) provides a right of reclamation to a seller, such as Movant, upon written demand made no later than 20 days after the commencement of a bankruptcy case, for goods sold within 45 days of the commencement date of the case.

3. The Debtor received the goods sold by Movant to the Debtor within the 45 days prior to the commencement of its bankruptcy case, at a time when, on information and belief, it

was insolvent, and Movant issued a reclamation demand in accordance with this Court's order of November 13, 2008 ("Order").

4. Movant has complied with the requirements to present its reclamation claim against the Debtor and as a result, Debtor should not have the right to sell Movant's goods during the next 120 days - as provided for in the Order - without adequately protecting Movant's interests.

5. Rather the Court should invoke its broad equitable powers to maintain the status quo until it can make a determination as to whether or not the Debtor was insolvent at the time it received Movant's goods; and, as to whether or not there are holders of a security interest in the Movant's goods or the proceeds thereof.

6. Movant joins the in the objections to the Motion filed by other parties to the extent not inconsistent with the foregoing.

WHEREFORE, LumiSource, Inc. respectfully requests that this Court enter an Order prohibiting Debtor from selling the goods subject to LumiSource, Inc.'s reclamation rights until this Court makes a determination as to whether or not LumiSource, Inc. is entitled to reclaim its goods and for such other and further relief as this Court deems just and reasonable.

Dated: Richmond, Virginia
November 28, 2008

LUMISOURCE, INC.

By: /s/ William H. Schwarzschild, III

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 28th day of November 2008 caused the service of a copy of the foregoing Objection to Order Establishing Procedures for Reclamation Demands (Docket No. 133), by first class mail, postage prepaid, at the address designated by them for service of papers; by facsimile or via email to those on the annexed Service List B, and electronically to the parties set forth on the Court's ECF Service List, maintained in this case.

/s/ William H. Schwarzschild, III

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